

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
JEFFREY LYNN GOSS	:	
Debtor	:	CASE NO. 4:23-bk-00256
:		
THE BANK OF NEW YORK MELLON,	:	
f/k/a The Bank of New York as trustee for	:	
registered Holders of CWABS, Inc., Asset-	:	
Backed Certificates, Series 2004-12,	:	
Movant	:	
:		
v.	:	
:		
JEFFREY LYNN GOSS,	:	
Respondent	:	
:		

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions.
6. Admitted that the loan has come due. Although the proof of claim indicated that the Debtor was responsible for payment of taxes and insurance, Movant continued to send statements to the Debtor indicating that it was collecting for taxes and insurance.
7. Debtor has continued to receive mortgage statements that indicate that there is an escrow account from which taxes are being paid. The statements have confused the Debtor. His counsel has informed him that he must pay the taxes and he will do so.

8. Denied that Movant is entitled to relief. Movant is protected by a sizable equity cushion. Moreover, Movant's sending of statements to the Debtor indicating that they were paying the taxes caused the confusion.
9. Allegations that the Debtor is responsible for payment of attorney fees and costs are denied since the confusion was caused by Movant..

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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